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DOE RFP CC NO. 4700.1
OUTGOING LETTER

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95 RF02382 **EG&G ROCKY FLATS**

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BRANCH, D.B.	
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FERRERA, D.W.	
FRAY, R.E.	
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GLOVER, W.S.	
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HARMAN, L.K.	
HEALY, T.J.	
HEDAH, T.	
HILBIG, J.G.	
HUTCHINS, N.M.	
JACKSON, D.T.	
KELL, R.E.	
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MARX, G.E.	
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POTTER, G.L.	
PIZZUTO, V.M.	
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SCHWARTZ, J.K.	
SETLOCK, G.H.	
STEWART, D.L.	
STIGER, S.G.	
TOBIN, P.M.	
VOORHEIS, G.M.	
WILSON, J.M.	

KRAMER, T.E.	X	X
LEDFORD, J.A.	X	X
LONDON, K.C.	X	X
PETER, K.	X	X
LEITNER, R.	X	X

CORRES. CONTROL	X	X
ADMN RECORD/080	X	X
TRAFFIC		
PATS/T130G		

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JNCLASSIFIED	
CONFIDENTIAL	
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V REPLY TO RFP CC NO:

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RIG & TYPIST INITIALS	

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EG&G ROCKY FLATS, INC.

ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

March 9, 1995

95-RF-02382

Briand C. Wu
 Manager Operable Unit 4
 Environmental Restoration Division
 DOE, RFFO

INFORMAL REVIEW ON CLASS 1 MODIFICATION FOR BUILDING 964, UNIT 24 -
 SRK-035-95

Action: Transmit Information to Colorado Department Public Health and Environment (Copy to
 Environmental Protection Agency)

Per your request, we have analyzed the changes needed to use the site's Part B permit closure plan for Building 964, Resource Conservation and Recovery Act (RCRA) Unit 24. The information is attached in the form of a draft letter to the Colorado Department Public Health and Environment (CDPHE). EG&G's RCRA permitting group and the CDPHE Operable Unit 4 (OU 4) representatives provided informal reviews and feel that these changes should be acceptable to the CDPHE as Class 1 modifications. As agreed with your staff, the attached draft letter will be processed through EG&G's RCRA permitting group for formal submittal.

The use of the Part B permit closure plan appears to present no risk to successfully completing the OU 4 closure. The main challenges of this project lie in other areas:

- Determining alternative storage location(s) for the wastes stored in Building 964 (including about 70 drums which contain free liquid);
- Obtaining funding for moving the waste;
- Obtaining accelerated funding to accelerate the building removal schedule; and
- Arranging resources to achieve the acceleration with site constraints.

EG&G needs to explore and resolve the challenges listed above before we can provide a commitment-quality schedule. We understand that the Department of Energy's goals include the use of Fiscal Year 95 funding for the Building 964 closure and removal. This goal will be considered a primary driver in our planning.

If you would like to discuss the Building 964 project further, please contact Andy Ledford, extension 8673, or Tim Kramer, extension 8505.

S. R. Keith

S. R. Keith
 Program Manager
 Solar Pond Projects

KCL:pjm

Orig. and 1 cc - B. C. Wu

cc:
 S. Howard - DOE, RFFO (SAIC)

ADMIN RECORD

1101-A00017

DRAFT LETTER

DRAFT LETTER

DRAFT LETTER

Mr.
Hazardous Waste Facilities
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, CO 80222-1530

Dear Mr. :

The Solar Pond Projects, Operable Unit 4 (OU 4), Phase I remediation will require the removal of two buildings adjacent to the ponds: Building 788 and Building 964. Because the removal of the buildings is driven by the remediation, the Department of Energy (DOE) had previously intended to include all enabling documentation in the OU 4 Interim Measure/Interim Remedial Action (IM/IRA) Environmental Assessment (EA) Decision Document. There is a difference in the status of the buildings, however, that suggests a better process is available for Building 964. This letter documents DOE reasoning and current path-forward.

Building 788 contains an Interim Status Resource Conservation and Recovery Act (RCRA) unit, and no approved closure plan was in-hand when the Solar Ponds remediation planning began. The Building 788 closure plan was included in the Decision Document: one of the benefits to this approach is simultaneous approval of the Decision Document and closure plan. Simultaneous approval ensures schedule integration. No delays in the pond closure action can occur because of a delay in the Building 788 closure plan approval.

When we realized that Building 964 also must be removed to allow the pond closure to proceed, including Building 964 in the Decision Document in the same manner as Building 788 seemed the most straightforward approach. Building 964 contains a Part B RCRA unit, however, and therefore that unit has an approved closure plan. Since no new approval is required, no schedule delay for the pond closure can arise from delayed approval on Building 964. DOE may be able to decrease schedule risk to the pond closure by removing Building 964 earlier than previously planned. Early removal would eliminate any construction interactions between Building 964 removal and pond closure construction, and facilitate DOE's budget management. Based on the same reasoning used for Building 788, Building 964 debris that are determined to be solid waste are also remediation waste.

For DOE to achieve an early removal of Building 964:

- A new location must be identified and, depending on the location chosen, prepared to store waste from the Building 964 storage unit.
- Class 1 modifications to the closure plan are needed to integrate Building 964 closure into the overall project. Most significantly, a partial unit closure will be performed: closure activities will not address the slab and soils. The concrete slab and soils are addressed in the Proposed Decision Document. Details of the modification are attached.

Based on discussions at the Joint Working Group meetings, starting on January 19, 1995, no obvious flaw in pursuing an early closure of Building 964 was discovered. DOE has added language to the Proposed Decision Document to address Building 964 as one of the site preparation activities described in section IV.6.4: "The DOE will remove the shell of Building 964 prior to implementing the IM/IRA. The removal will be conducted according to the approved closure plan that currently exists in the Rocky Flats Environmental Technology Site RCRA Part B permit. The closure certification will be submitted upon completion of the IM/IRA when the building foundation and any contaminated soils have been removed and dispositioned beneath the final engineered cover." While this wording does not require earlier removal of Building 964 than previously planned (building removal has been planned in the pre-Interagency Agreement

(IAG) milestone portion of the construction for some time), it does allow early removal.

DOE proposes to plan closure of Building 964 using the existing Part B closure plan. Some minor changes in the permit closure plan for B964 are needed to update the permit to reflect recent changes in State regulations (for example, §264.552) and to incorporate the proposed OU 4 interim measure currently in public comment. These changes do not substantially alter the permit conditions or reduce the capacity of Rocky Flats to protect human health and the environment. DOE feels the changes may be accomplished as a Class 1 permit modification. We understand we may submit the changes, which include a change in the expected year of the closure, to the Colorado Department Public Health and Environment at any time prior to notification of closure per §264.112(c).

If you would like to discuss this further, please contact Briand Wu, 966-5899.

Sincerely,

cc:
S. R. Keith, EG&G
T. E. Kramer, EG&G
J. A. Ledford, EG&G
K. C. London, EG&G
K. G. Peter, EG&G
S. Howard, SAIC
D. Mauer, DOE/RFFO

CHANGES TO ROCKY FLATS PART B PERMIT CLOSURE PLAN FOR B964 TO ACHIEVE ACCELERATED CLOSURE

Building 964 will be closed in accord with the Rocky Flats Part B permit, in particular with Parts VIII, IX, and X. DOE must notify CDPHE of several minor changes in the B964 closure plan as listed below. These changes will incorporate recent changes in State regulations (specifically at 6 CCR 1007-3 Part 264.552) and the IAG OU 4 interim measure/interim remedial action into the B964 plan. DOE tentatively has identified the following changes as a Class 1 permit modification, and requests CDPHE's concurrence that they represent a Class 1 modification:

- Equipment and structures from B964 that cannot be decontaminated will be managed as hazardous remediation waste and placed into the OU 4 pond closure. This change reflects the inclusion of B964 in the corrective action at the Solar Ponds, which leads to a designation of the building debris waste as remediation waste. (Reference Part VIII A. 1. f. "will be ... disposed at an off-site facility". It should be noted that Part VIII A. 9. f. 8. supports the proposed DOE plan without change, since it designates "NTS or another approved facility"; following approval of the Decision Document, the Solar Ponds will be an approved site for B964 remediation waste)
- The Building 964 closure will be partial. The unit closure before the OU 4 interim measure/interim remedial action will address Building 964 elements exclusive of slab and soil. This change fully meets the intent stated in Part VIII A. 5. a. The change also reflects the inclusion of IHSS 176 in OU 4 as established in the OU 4 Decision Document. (Reference Part VIII A. 5. d. and e.)
- The partial closure of B964 will be scheduled for completion prior to the Solar Ponds closure. Certification of closure will be filed following the Solar ponds closure. Soil sampling and analysis have already been completed. This change brings the B964 closure into alignment with the Solar Ponds interim measure/interim remedial action. (Reference Part VIII A. 7. and 8.)
- Drummed waste will be moved to another appropriate storage unit at Rocky Flats prior to any further treatment. Storage could be in B374, B774, or B776, but is more likely to be in other buildings or structures. This change reflects the storage areas currently available. (Reference Part VIII B. 3).